

REMARKS

Reconsideration and allowance of the subject application in view of the foregoing amendments and the following remarks is respectfully requested.

Upon entry of this Amendment, claims 1-7, 9, 10, 12-22, and 24-29 are *currently amended*, no claims have been *canceled*, and no claims have been *newly added*. Accordingly, claims 1-29 are left *pending*.

Claims 4, 5, 12, 13, 18, 19, 26 and 27 were objected to for informalities relating to the use of the acronyms "XML" and "DTD," without description of the terms to which such acronyms apply. In addition, claims 5, 13, 19 and 27 were rejected under 35 USC § 112, second paragraph, because the phraseology "for the elements defined in DTD" were cited to lack sufficient antecedent basis. The foregoing objection to claims 4, 5, 12, 13, 18, 19, 26 and 27 and rejections of claims 5, 13, 19 and 27 are overcome in view of the amendments to the foregoing claims, without the addition of any new matter.

Claims 1, 2, 4-9, 12-16, 18-23 and 26-29 were rejected under 35 USC § 102(e) as being anticipated by US Patent Application Publication US 2002/0003881 to Reitmeier *et al.* (hereinafter "Reitmeier"). The rejection is respectfully traversed in view of the following remarks.

Reitmeier provides a system for securing and distributing an information stream by dividing the information into a collection of segments, compressing the segments, rearranging the order of segments and encrypting the segments.

Referring to Applicant's independent claims 1, 7, 15, 21 and 29, nowhere does Reitmeier hint or suggest the inventive claim elements directed to security-coupling, namely setting a security coupling level for the elements of information that are transmitted. For example, claim 1 recites "a security-coupling level setting unit which sets a security-coupling level of the plurality of elements of information."

Referring to Reitmeier's Fig. 1, a segmentation module 110 divides the information into multiple segments to produce a segmented information stream. (p.2, para. 0023) A compression module 115 compresses the segmented information, with the caveat that the order of segmenting and compression may be reversed. (p.2, para. 0027, p.3, para. 0028) A re-sequencing module 130 rearranges the segments based on a predetermined pseudorandom pattern. (p.3, para. 0029) The

point of the re-sequencing is to remove temporal continuity of the underlying audio/video information in a way that renders the information unusable (or unenjoyable) to unauthorized users. (p.3, para. 0030) The re-sequencing module stores the actual sequence of the segments in an index table, which is encrypted to form an encrypted index table. (p.2, para. 0031) At the receiving end, decryption modules 160, 150 are respectively used to decrypt the encrypted index table and scrambled sequence of segments (i.e., the out-of-sequence sequence of segments), and a random access module 165 uses the index table to re-sequence the information stream into its original sequence of segments. (p.3, para. 0036)

Nowhere do any of the foregoing components, and their associated functions, provide or establish levels for security coupling between the segments. In the embodiments disclosed by Applicant's specification, the levels can be set to high or low levels, based on the public or private nature of the elements of information, or the combination of the elements of information. (pp.11-12)

Referring to Applicant's aforementioned independent claims, nowhere does Reitmeier hint or suggest the inventive claim elements directed to "set[ting] a dividing rule that divides the information into a plurality of loosely coupled information, based on the security-coupling level." In addition, nowhere does Reitmeier hint or suggest "divide[ing] the information into the plurality of pieces of loosely coupled information, based on the dividing rule received." While Reitmeier includes a teaching that the segment sizes may be based on the security level desired, with more or smaller segments yielding greater security, nowhere is there any hint or suggestion that the segmentation is based on the security coupling between different segments. (p.2, para. 0026) In fact, given that the segmentation in Reitmeier is based on a pseudorandom sequence, the reference teaches away from division based upon a meaningful criterion, namely a security-coupling level, as presently claimed by Applicant.

Independent claims 1 and 15, and dependent claims 8 and 22, further include recitations directed to receiving the aforementioned loosely coupled information and a dividing rule, and restructuring the information from the plurality of pieces of coupled information based on the dividing rule received. In the embodiments disclosed by Applicant's specification, the dividing rule may establish a rule for how to divide the elements according to high or low security-coupling levels. (p.14, ll.4-23)

However, as noted, Reitmeier discloses receiving an encrypted index table, decrypting the index table, and using the decrypted index table to determine how to re-sequence the received string of segments into their original order. Nowhere does the reference hint or suggest using a dividing rule at the receiving end, one that divides the information into loosely coupled information, to re-structure the pieces of loosely coupled information at the receiving end. Reitmeier uses no such rule, but rather simply the exact sequence of segments originally used to randomize the segments, which is included in the index table. There is no suggestion, by even analogy, between Reitmeier's teaching and Applicant's foregoing claim recitations. Accordingly, Applicant respectfully requests that the rejection be withdrawn.

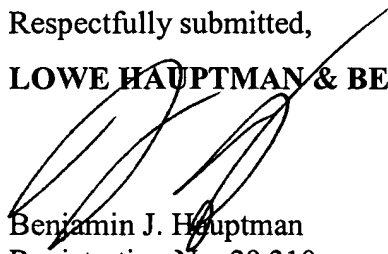
Furthermore, as the remaining claims depend from the aforementioned independent base claims, such claims are allowable for at least the foregoing reasons, and Applicant respectfully requests that the rejection be withdrawn with respect to the dependent claims.

For the aforementioned reasons, the cited reference cannot anticipate (or render obvious) Applicant's claimed invention, and it is therefore respectfully submitted that the present application should be in condition for allowance and a notice to such effect is earnestly solicited.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 07-1337 and please credit any excess fees to such deposit account.

Respectfully submitted,

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